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ATTORNEYS

JUSTIN M. REILLY, ESQ.  
KEITH E. WILLIAMS, ESQ.

PARALEGALS

ROSA COSCIA  
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**Via: EDNY ECF**

**October 10, 2023**

Honorable Judge Carol Bagley Amon  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Martinez, et al. v. Atlantis Super Wash Center, Inc., et al.*; 23-cv-04667 (CBA)(PK)**

Dear Hon. Judge Amon,

I represent Plaintiffs in this FLSA action. I write pursuant to Your Honor's Individual Rules and in response to Defendants' Request for a Pre-Motion Conference in anticipation of their Motion to Dismiss the Complaint.

While Plaintiffs do not believe Defendants' basis for dismissal has any merit, Plaintiffs intend on filing an Amended Complaint to cure any perceived deficiencies. Pursuant to Federal Rule 15, Plaintiffs deadline to file an Amended Complaint as of right is October 27, 2023. *See* Fed. R. Civ. P. 15(1)(B) ("A party may amend its pleading once as a matter of course within ... 21 days after service of a motion under Rule 12(b)").

In the event Defendants renew their Request for a Pre-Motion Conference in advance of moving to dismiss the amended complaint, Plaintiffs will be ready to submit a proposed briefing schedule for Your Honor's review and consideration.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Keith E. Williams", is written over a light blue circular stamp.

Keith E. Williams, Esq.

cc: all counsel of record, via ECF.